IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref. No. 1195
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
In re:	Chapter 11

NOTICE OF FILING REVISED PROPOSED ORDER <u>AND PAYOFF LETTER AGREEMENT</u>

PLEASE TAKE NOTICE that on November 11, 2022 and November 14, 2022, the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>"), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "<u>Bankruptcy Code</u>") in the United States Bankruptcy Court for the District of Delaware (the "<u>Court</u>").

PLEASE TAKE FURTHER NOTICE that on March 29, 2023, the Debtors filed the *Motion of Debtors for Turnover of Assets Held by DIG* [D.I. 1195] (the "<u>DIG Turnover Motion</u>"). The Debtors have revised the proposed form of order attached to the DIG Turnover Motion (the "<u>Revised DIG Turnover Order</u>"), a copy of which is attached hereto as <u>Exhibit A-1</u>. A copy of the Revised DIG Turnover Order compared against the proposed order attached to the DIG Turnover Motion is attached hereto as <u>Exhibit A-2</u>. The Debtors have also revised the form of DIG Payoff Letter attached to the DIG Turnover Motion (the "<u>Revised DIG Payoff Letter</u>"), a copy of which is attached hereto as <u>Exhibit B-1</u>. A copy of the Revised DIG Payoff Letter compared against the DIG Payoff Letter attached to the DIG Turnover Motion is attached hereto as <u>Exhibit B-1</u>.

PLEASE TAKE FURTHER NOTICE that the deadline to file objections, if any, to the relief requested in the DIG Turnover Motion is hereby extended to April 7, 2023 at 4:00 p.m. (ET) (the "Extended Objection Deadline"). Objections, if any, to the relief requested in the DIG Turnover Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before the Extended Objection Deadline. At the same time, you must also serve a copy of the objection upon the undersigned counsel so as to be received no later than the Extended Objection Deadline.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

PLEASE TAKE FURTHER NOTICE that copies of the DIG Turnover Motion may be obtained from the Court's website, https://ecf.deb.uscourts.gov/, for a nominal fee, or obtained free of charge by accessing the website of the Debtors' claims and noticing agent, https://cases.ra.kroll.com/FTX.

Dated: April 4, 2023 Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407) Kimberly A. Brown (No. 5138) Matthew R. Pierce (No. 5946) 919 Market Street, Suite 1800 Wilmington, Delaware 19801 Telephone: (302) 467-4400 Facsimile: (302) 467-4450

E-mail: landis@lrclaw.com brown@lrclaw.com pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*) James L. Bromley (admitted *pro hac vice*) Brian D. Glueckstein (admitted *pro hac vice*) Alexa J. Kranzley (admitted *pro hac vice*) 125 Broad Street

New York, NY 10004 Telephone: (212) 558-4000 Facsimile: (212) 558-3588

E-mail: dietdericha@sullcrom.com bromleyj@sullcrom.com gluecksteinb@sullcrom.com kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession